

IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

In RE:

JOSHUA S. GREAVES

Debtor

PEOPLES NATURAL GAS COMPANY,
LLC

Movant,

vs.

JOSHUA S. GREAVES, and RONDA J.

WINNECOUR, ESQUIRE, Trustee

Respondents.

BANKRUPTCY CASE NO. 19-24101

MOTION NO.

CHAPTER 13

**NOTICE OF VIDEO CONFERENCE HEARING AND RESPONSE DEADLINE
REGARDING MOTION OF PEOPLES NATURAL GAS COMPANY, LLC SEEKING
TO INCREASE YOUR PLAN PAYMENT TO COVER YOUR UTILITY BILLS
(MODIFIED PROCEDURES FOR REMOTE PARTICIPATION)**

EFFECTIVE OCTOBER 1, 2020

TO THE DEBTORS AND ALL RESPONDENTS:

You, (the Debtor), have not paid your post petition utility bills as and when they became due. The Peoples Natural Gas Company, LLC is entitled to seek to terminate your utility service because of this failure to pay the bills.

The PEOPLES NATURAL GAS COMPANY, LLC understands that your utility service is vital to your health and safety and to the success of your Chapter 13 Plan. In past hearings, the majority of Debtors in this District have asked the Court to include their utility payments in their Chapter 13 Plan to avoid the possibility of termination. Because this appears to be the solution preferred by most Debtors, the PEOPLES NATURAL GAS COMPANY, LLC, instead of seeking to terminate your utility service at this time, is asking the Bankruptcy Court in this Motion to require the Debtor ("you") to pay your post petition delinquent utility bill and your ongoing monthly utility budget as part of your Plan payment to the Chapter 13 Trustee. **If the Court grants this Motion, your Plan payment will increase and, if you have a wage attachment, your wage attachment will increase.** This increase will pay your post petition utility bill, and you will no longer have to pay the PEOPLES NATURAL GAS COMPANY, LLC directly. If you want this to happen, you do not need to do anything else.

If you do not want this to happen, then you or your attorney must file with the Clerk and serve upon the undersigned attorney for the Movant S. James Wallace, a written response to the attached Motion. This Response must be filed and served in accordance with the Federal Rules of Bankruptcy Procedure, Local Rules and Procedures of this Court, and the procedures of the presiding Judge as found on the Judge's web page at www.pawb.uscourts.gov. Both the Clerk and the Attorney must receive your written response on or before December 13, 2020, (Seventeen (17) calendar days after the date of this Notice). If your written response is not

received by this date, the Bankruptcy Court will grant this Motion without a hearing. See Local Bankruptcy Rule 9013.4.

If you do not file a Response but pay all the delinquent bills and any security deposit due on your post petition account before the date a Response is due, December 13, 2020, **and you advise the attorney in writing of your payment before the Court enters a default Order**, the PEOPLES NATURAL GAS COMPANY, LLC may be willing to withdraw this Motion without prejudice, if time allows. If you do file a Response but then pay all the delinquent bills and any security deposit due on your post petition account before the hearing date set by the Court, the PEOPLES NATURAL GAS COMPANY, LLC may be willing to withdraw this Motion without prejudice.

You should take this paper to your lawyer at once. He or she will explain exactly what is happening, what this means to you and what your options are.

If you file and serve your written response on time, a **video conference** hearing will be held on January 13, 2021 at 10:00 A.M. before Judge Gregory L. Taddonio. All parties wishing to appear by video conference must register by submitting a video conference registration form via the link published on Judge Taddonio's website (which can be found at <http://www.pawb.uscourts.gov/judge-taddonios-video-conference-hearing-information>) no later than 4 p.m. on the business day prior to a scheduled hearing. All counsel and parties participating by video conference shall comply with Judge Taddonio's Modified Procedures for Remote Participation (effective October 1, 2020), (which can be found at <http://www.pawb.uscourts.gov/sites/default/files/pdfs/glt-proc-appearances.pdf>).

Only a limited time of ten (10) minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled by the Court for a later date. **Remember that no hearing will be held if you do not timely serve a written response.**

Date of service: November 24, 2020

GRB Law
Attorneys for Movant

/s/S. James Wallace
S. James Wallace
PA. ID No. 28815
jwallace@grblaw.com
Jeffrey R. Hunt
P.A. ID No. 90342
jhunt@grblaw.com
GRB Law
437 Grant Street, 14th Floor
Pittsburgh, Pa. 15219-6107
412-281-0587